

EXHIBIT C

From: [Alex Kaufman](#)
To: [Keith Roussel](#)
Cc: [Kenneth McLellan](#); [Kimberly Moy](#)
Subject: RE: Garmashov v. USPA, Case No. 1:21-cv-04917-JGK, (Pursuant to Federal Rule of Evidence 408)
Date: Monday, December 5, 2022 3:16:09 PM
Attachments: [image001.png](#)
[image002.png](#)

Keith:

This draft does not represent the settlement agreement and order.

Specifically, the releases are **mutual general releases of the parties**. We never discussed agents etc. We also never agreed to Yuri making any representations or warranties. There is no non disparagement provision in the settlement agreement and order.

Alex Kaufman

Admitted in AZ, DC, GA, MA, & NY

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From: Keith Roussel <roussel.k@wssllp.com>
Sent: Monday, December 5, 2022 3:00 PM
To: Alex Kaufman <AKaufman@hallboothsmith.com>
Cc: Kenneth McLellan <mclellan.k@wssllp.com>; Kimberly Moy <moy.k@wssllp.com>
Subject: Garmashov v. USPA, Case No. 1:21-cv-04917-JGK, (Pursuant to Federal Rule of Evidence 408)

Dear Mr. Kaufman:

I am assisting Kenneth McLellan, Esq. with the handling of this action.

Attached for your review is a PDF and word version of our proposed Settlement Agreement and Release dated December 5, 2022 provided in accordance with the Court's Opinion and Order dated November 30, 2022 (ECF Doc. No. 63).

We note that this proposed Settlement Agreement and Release is being provided, to give you

and your client time to review the proposed language in the attached Settlement Agreement and Release.

We are still awaiting approval from the carrier concerning the proposed language and terms, but we wanted to give you an opportunity to see this proposed language.

If you have any comments we would ask that they be put into the attached word version of the proposed Settlement Agreement and Release using red line “track changes” feature.

Please confirm your receipt of this e-mail.

Thanks.

Best Regards,

Keith R.M. Roussel
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